

UNITED STATES BANKRUPTCY COURT, NORTHERN DISTRICT OF ILLINOIS, EASTERN DIVISION

RE: BRIAN A LUCAS

) Case No. 17 B 30254
)
Debtor) Chapter 13
)
) Judge: CAROL A DOYLE

NOTICE OF MOTION

BRIAN A LUCAS
1111 S ASHLAND AVE
CHICAGO, IL 60607

THE SEMRAD LAW FIRM LLC
via Clerk's ECF noticing procedures

Please take notice that on November 14, 2017 at 9:15 am my designee or I will appear before the Honorable Judge CAROL A DOYLE at 219 South Dearborn Courtroom 742, Chicago, IL and present the motion set forth below.

I certify under penalty of perjury that this office caused a copy of this notice to be delivered to the persons named above by U.S. mail at 55 E Monroe St., Chicago, IL or by the methods indicated on November 03, 2017.

/s/ Tom Vaughn

TRUSTEE'S MOTION TO DISMISS FOR UNREASONABLE DELAY

Now comes Tom Vaughn, Trustee in the above entitled case and moves the Court to dismiss this case in support thereof states:

1. On October 09, 2017 the Debtor filed a petition and plan under Chapter 13 of Title 11 U.S.C.
2. That the above-captioned plan has not yet been confirmed .
3. That the Debtor has caused unreasonable delay that is prejudicial to creditors by failing to:

Debtor has failed to provide 2013, 2014, 2015 and 2016 taxes.

WHEREFORE, the Trustee prays that this case be dismissed for unreasonable delay by the debtor pursuant to 11 U.S.C. § 1307 (c) (1).

Respectfully submitted,

TOM VAUGHN
CHAPTER 13 TRUSTEE
55 E. Monroe Street, Suite 3850
Chicago, IL 60603
(312) 294-5900

/s/ Tom Vaughn